

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

October 25, 2016

BY EMAIL/ECF

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. El Gammal  
15 Cr. 588 (ER)

Dear Judge Ramos,

We write to request a conference this week on the following time-sensitive issues:

1. The government's failure to provide a workable exhibit list;
2. The government's failure to provide or commit to a deadline for its final translations; and
3. The government's failure to give proper expert notice under Rule 16 of the Federal Rules of Evidence.

We seek an appearance this week as Mr. Habib's wife is due to give birth any day now. The first two issues have been fully briefed.

Respectfully submitted,

/s/

\_\_\_\_\_  
Habib/Mirón/Shroff  
Assistant Federal Defenders

cc: AUSAs Tekeei, Quigley & DeFillipis  
Mr. Ahmed M. El Gammal (via mail)